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WARNER MUSIC GROUP CORP.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DEBRA SLEDGE, JOAN SLEDGE,  
KATHY SLEDGE LIGHTFOOT and KIM  
SLEDGE ALLEN, jointly d/b/a "SISTER  
SLEDGE"; RONEE BLAKLEY; and  
GARY WRIGHT, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

WARNER MUSIC GROUP CORP.,

Defendant.

CASE NO. 12-CV-0559-RS

**JOINT STATEMENT/STIPULATION AND  
[PROPOSED] SCHEDULING ORDER**

Judge: Hon. Richard Seeborg

1 Plaintiffs in the above captioned consolidated action and Defendant Warner Music Group  
2 Corp. ("WMG") together submit this joint statement/stipulation.

3 On August 31, 2012, this Court granted a stay of the proceedings to allow the parties to  
4 participate in settlement discussions and set a further status conference on March 14, 2013. Over  
5 the course of those six months, the parties diligently participated in settlement negotiations. They  
6 exchanged information and analysis to facilitate the negotiations. They participated in two full  
7 day mediation sessions with the Honorable Daniel Weinstein (Ret.), and they held additional  
8 phone conferences with and without the mediator.

9 On February 28, 2013, pursuant to the Court's stay order, the parties made a joint filing  
10 with the Court reporting on the status of the negotiations and requesting that the case remained  
11 stayed because of the ongoing talks. The Court extended the stay, setting a Case Management  
12 Conference for May 2, 2013 and asking the parties to make a joint filing regarding the status of  
13 the negotiations on April 18, 2013. The Court's order, like the first, provided that if, at the time  
14 of the filing of the joint statement the parties agreed that further settlement discussions would be  
15 fruitful, they could seek additional time for further negotiations. Stay Order at 3.

16 The parties have continued to diligently pursue settlement negotiations over the last two  
17 months. In particular, the parties participated in an in-person settlement meeting on March 6,  
18 2013. Thereafter, the parties continued their discussions by phone and email, which discussions  
19 are ongoing. While the parties have not reached a settlement at this juncture, the negotiations are  
20 constructive and progress has been made. All parties are committed to continuing the settlement  
21 discussions at this time.

22 For these reasons, the parties jointly file this statement/stipulation to inform the Court that  
23 they believe further settlement discussions would be fruitful and to seek additional time for  
24 continued negotiations. Specifically, the parties hereby agree and stipulate, subject to the  
25 approval of the Court, to the following:

- 26 1. A further Case Management Conference ~~to be set in 60 days, subject to the~~  
27 ~~schedule of the Court; and~~ shall be scheduled for 6/27/13 at 10:00 a.m.
- 28 2. Fourteen days before the Case Management Conference—or before that date if

1 Plaintiffs and/or WMG believe that settlement cannot be reached—the parties shall  
2 file a joint statement/stipulation with the Court alerting the Court to the fact that  
3 settlement could not be reached and resetting a schedule for WMG’s response to  
4 the Amended Complaint (which deadline for WMG’s response shall be no sooner  
5 than 30 days from the date of the joint statement) and subsequent dates and  
6 deadlines. In the alternative, if the parties agree that further settlement discussions  
7 would be fruitful, the parties can instead file a joint statement/stipulation seeking  
8 additional time for further settlement negotiations.

9  
10 Dated: April 18, 2013

Respectfully Submitted,

11  
12 By: /s/ Tamerlin J. Godley  
13 Tamerlin J. Godley  
MUNGER, TOLLES & OLSON LLP

14 *Attorneys for Defendant*  
15 *Warner Music Group Corp.*

16 Dated: April 18, 2013

Respectfully Submitted,

17  
18 By: /s/ Daniel L. Warshaw  
19 Daniel L. Warshaw  
PEARSON, SIMON & WARSHAW, LLP

20 *Interim Lead Counsel Representative for Plaintiffs\**  
21  
22  
23

24 \* A complete list of the attorneys for Plaintiffs is attached to the Amended Complaint.  
25  
26  
27  
28

Filer's Attestation

I, Tamerlin J. Godley, am the ECF user whose identification and password are being used to file this JOINT STATEMENT/STIPULATION AND [PROPOSED] SCHEDULING ORDER.

I hereby attest that the counsel listed above concur in this filing.

Dated: April 18, 2013

/s/ Tamerlin J. Godley

Tamerlin J. Godley

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: 4/18/13



Honorable Richard Seeborg  
U.S. District Judge